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 HSBC MORTGAGE CORPORATION (USA) AND
 HSBC BANK USA, N.A.

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

Philip Wong, Frederic Chaussy, and Leslie
 Marie Shearn, individually, on behalf of all
 others similarly situated, and on behalf of
 the general public,

Plaintiffs,

v.

HSBC Mortgage Corporation (USA);
 HSBC Bank USA, N.A.; and DOES 1
 through 50, inclusive,

Defendants.

Case No. C 07 2446 MMC [ECF]

**DECLARATION OF RONALD LORD IN
 SUPPORT OF DEFENDANTS' MOTION
 FOR RULE 11(C) SANCTIONS**

Date: June 6, 2008
 Time: 9:00 a.m.
 Courtroom: 7 (19th Floor)
 Judge: Hon. Maxine M. Chesney

DECLARATION OF RONALD LORD

Case No. C 07 2446 MMC [ECF]

1 I, Ronald Lord, hereby declare and state:

2 1. I have personal knowledge of the facts set forth below. If called as a witness,
3 I could and would testify to the following:

4 2. I am employed by HSBC Technologies and Services, Inc. (hereinafter
5 "HTSU"). My job title is Manager, E-Mail Operations. In my job, I manage E-mail Operations for
6 all HSBC USA entities.

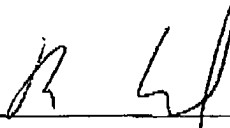
7 3. In or about March 13, 2008, I was directed to conduct a search on the
8 company's e-mail system for potentially responsive documents to Plaintiffs' discovery requests.

9 4. As part of my search, I discovered a number of e-mail communications
10 between Plaintiff Philip Wong and his attorney, Bryan Schwartz, as well as additional e-mail
11 communications between HMCU employees and representatives of the Nichols Kaster & Anderson
12 law firm. Attached hereto as Exhibit A are true and correct copies of a number of these e-mail
13 communications.

14 5. Attached hereto as Exhibit B is a true and correct copy of the "Notice to
15 Users" which, since January 1, 2006, appears on the computer screen each time an HMCU employee
16 logs onto the work computer system.

17 I declare under penalty of perjury under the laws of the States of California and New
18 York and the United States of America that the foregoing declaration is true and correct to the best
19 of my personal knowledge.

20 Executed this 29th day of April 2008, in Buffalo, New York.

21 
22

23 RONALD LORD

24 Firmwide:85026148.1 023404.1043

EXHIBIT A

**THIS EXHIBIT IS FILED WITH DEFENDANTS' MOTION FOR
ADMINISTRATIVE RELIEF TO FILE UNDER SEAL EXHIBITS IN SUPPORT
OF DEFENDANTS' MOTION FOR RULE 11(C) SANCTIONS**

EXHIBIT B

